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7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 2021 DODGE DURANGO UTILITY SRT
HELLCAT, VIN: 1C4SDJH99MC757148,
15 LICENSE NUMBER: 8YGP548,

16 Defendant.

2:22-MC-00334-DAD-JDP

STIPULATION AND ORDER EXTENDING
TIME FOR FILING A COMPLAINT FOR
FORFEITURE AND/OR TO OBTAIN AN
INDICTMENT ALLEGING FORFEITURE

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18 It is hereby stipulated by and between the United States of America and potential claimants
19 Sukhmanpreet Jawanda and Joseph Edward (“claimants”), by and through their respective counsel, as
20 follows:

21 1. On or about August 15, 2022, claimants Sukhmanpreet Jawanda and Joseph Edward filed
22 claims in the administrative forfeiture proceeding with the Drug Enforcement Administration with
23 respect to the above-referenced vehicle (hereafter “defendant vehicle”), which was seized on or about
24 May 12, 2022.

25 2. The Drug Enforcement Administration has sent the written notice of intent to forfeit
26 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
27 person to file a claim to the defendant vehicle under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other
28 than claimants has filed a claim to the defendant vehicle as required by law in the administrative

1 forfeiture proceeding.

2 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
3 forfeiture against the defendant vehicle and/or to obtain an indictment alleging that the defendant vehicle
4 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
5 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
6 That deadline was November 11, 2022.

7 4. By Stipulation and Order filed November 15, 2022, the parties stipulated to extend to
8 January 10, 2023, the time in which the United States is required to file a civil complaint for forfeiture
9 against the defendant vehicle and/or to obtain an indictment alleging that the defendant vehicle is subject
10 to forfeiture.

11 5. By Stipulation and Order filed January 10, 2023, the parties stipulated to extend to April
12 10, 2023, the time in which the United States is required to file a civil complaint for forfeiture against the
13 defendant vehicle and/or to obtain an indictment alleging that the defendant vehicle is subject to
14 forfeiture.

15 6. By Stipulation and Order filed April 10, 2023, the parties stipulated to extend to July 10,
16 2023, the time in which the United States is required to file a civil complaint for forfeiture against the
17 defendant vehicle and/or to obtain an indictment alleging that the defendant vehicle is subject to
18 forfeiture.

19 7. By Stipulation and Order filed July 10, 2023, the parties stipulated to extend to September
20 8, 2023, the time in which the United States is required to file a civil complaint for forfeiture against the
21 defendant vehicle and/or to obtain an indictment alleging that the defendant vehicle is subject to
22 forfeiture.

23 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
24 to December 7, 2023, the time in which the United States is required to file a civil complaint for
25 forfeiture against the defendant vehicle and/or to obtain an indictment alleging that the defendant vehicle
26 is subject to forfeiture.

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1 9. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant vehicle and/or to obtain an indictment
3 alleging that the defendant vehicle is subject to forfeiture shall be extended to December 7, 2023.

4 Dated: 9/6/2023

PHILLIP A. TALBERT
United States Attorney

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6 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

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8 Dated: 9/5/2023

/s/ Mark J. Reichel
MARK J. REICHEL
Attorney for potential claimants Sukhmanpreet
Jawanda and Joseph Edward
(Authorized by email)

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11 IT IS SO ORDERED.

12 Dated: September 6, 2023

Dale A. Drozd
DALE A. DROZD
UNITED STATES DISTRICT JUDGE